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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

HANS MENOS, derivatively on behalf of  
ECO SCIENCE SOLUTIONS, INC.,

Plaintiff,

v.

JEFFERY L. TAYLOR, DON L.  
TAYLOR, L. JOHN LEWIS, S.  
RANDALL OVESON, and GANNON  
GIGUIERE,

Defendants,

and

ECO SCIENCE SOLUTIONS, INC.,

Nominal Defendant.

Case No. 3:17-CV-00662-LRH-CBC

**STIPULATION AND  
ORDER REGARDING DEFENDANTS'  
RESPONSE TO AMENDED  
COMPLAINT [ECF 61]**

**(Third Request)**

Pursuant to LR IA 6-1 and LR IA 6-2, Plaintiff Hans Menos (“Plaintiff”), by and through his counsel the law firms of Leverty & Associates Law Chtd. Ltd. and The Rosen Law Firm, P.A. and Defendants Jeffery L. Taylor, Don L. Taylor, L. John Lewis, S. Randall Oveson and Gannon

1 Giguere (collectively, “Individual Defendants”) and Nominal Defendant Eco Science Solutions,  
2 Inc. (“Nominal Defendant” and with Individual Defendants, “Defendants” and with Plaintiff, the  
3 “Parties”), by and through their counsel, the law firm of Greenberg Traurig, LLP, hereby stipulate  
4 and agree:

5       **WHEREAS**, on February 5, 2019, the Court entered the Parties’ Stipulation and Order  
6 Regarding Defendants’ Response to Amended Complaint and Plaintiffs’ Response to the  
7 Emergency Motion to Stay Civil Case (the “February Order”) (Dkt. No. 55). Pursuant to the  
8 February Order, if Judge Kobayashi denied the motion to stay in the related derivative actions,  
9 *Bell v. Taylor, et al.*, Case No. 17-cv-00530 (D. Hawaii) and *D’Annunzio v. Taylor, et al.*, Case  
10 No. 18-cv-00016 (D. Hawaii) (the “Hawaii Actions”), then Defendants will withdraw their  
11 Emergency Motion to Stay Civil Case (“Stay Motion”) (Dkt. No. 52) and the Parties would agree  
12 to a schedule for the response to the Verified First Amended Shareholder Derivative Complaint  
13 (“Amended Complaint”). On April 26, 2019, Judge Kobayashi denied the motion to stay in the  
14 Hawaii Actions;

15       **WHEREAS**, on August 6, 2019, Defendants withdrew the Stay Motion (Dkt. No. 57).

16       **WHEREAS**, there are additional related proceedings in the United States District Court  
17 for the Southern District of California (*U.S. v. Giguere*, Case No. 18CR3071-WQH) previously  
18 scheduled for an August trial but which resolved with a plea agreement on July 23, 2019;

19       **WHEREAS**, the parties in this action were monitoring the related proceedings, the  
20 closure of which provides some guidance to the prosecution and defense of this action;

21       **WHEREAS**, the parties in this action have preliminarily discussed alternative dispute  
22 resolution, are continuing these discussions, and require time to continue those discussions and  
23 potentially coordinate with the parties to the related derivative actions;

24       **NOW, THEREFORE**, the parties in this action stipulate and agree as follows:

25       1. Defendants shall file an answer to Plaintiff’s Verified Amended Shareholder  
26 Derivative Complaint filed with this Court on December 21, 2018 (the “Amended Complaint”) by  
27 September 13, 2019.

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2. The parties will continue to discuss alternative dispute resolution.

3. This request is made in good faith and not for the purpose of delay. Rather, the stipulation and schedule set forth above will further the efficient and expedient disposition of the above-captioned case.

This is the third stipulation requesting a new deadline for the response to the Amended Complaint since a decision in the Hawaii Action on the stay issue.

Dated: September 10, 2019

Dated: September 10, 2019

By: /s/ Patrick R. Leverty

By: /s/ Christopher R. Miltenberger

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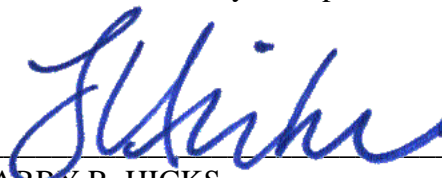
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*Attorneys for Plaintiff*

*Attorneys for Defendants and Nominal Defendant*

**IT IS SO ORDERED** , *nunc pro tunc*.

DATED this 11th day of September, 2019.

  
\_\_\_\_\_  
LARRY R. HICKS  
UNITED STATES DISTRICT JUDGE